

Appl. No.: 10/689,472

Amendment Dated: January 29, 2007

Reply to Office Action of November 28, 2006

“a metallic centralizer (74; *metallic* as admitted by cross section, see MPEP) in gripping engagement with said upset portion on said metallic pipe whereby said centralizer and said upset are prevented from any relative movement, ...”

The Halkyard reference makes it absolutely clear that there is in fact relative movement between the metallic centralizer 74 and what the Examiner has referred to as the upset. In rejecting Claims 1 and 34, the Examiner has referenced Fig. 5 of Halkyard. Fig. 5 clearly shows that relative movement between centralizer 74 and upset 72 is not prevented, and in fact is expressly permitted and indeed desired. In this regard, the Examiner's attention is respectfully directed to column 3, lines 34-39 where it is stated:

“The opposite end 68b of member 68 is plain and receives between it and an enlarged section 72 on portion 62 a shouldered ring 74 threaded on section 72 and serves to maintain centralization of the pipe portion 62 within sleeve member 68.”

The cited lines cannot be read in any fashion to teach that the shouldered ring (centralizer) is prevented from any relative movement relative to the upset (enlarged section 72). Indeed, the cited lines teach exactly the opposite. Since shouldered ring 74 is threaded on section 72, it clearly is allowed movement relative to section 72 and indeed without it the invention of Halkyard as exemplified in Fig. 5 would be frustrated. Since both independent Claims 1 and 34 clearly call for the centralizer and the upset portion to

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be prevented from any relative movement, it is clear that Halkyard does not anticipate either of those claims.

With respect to Claims 2, 3, 10, 11, 36, 43 and 44, since those claims further limit Claims 1 or 34, and since Claims 1 and 34 are clearly patentable over Halkyard, it is respectfully submitted that those claims are likewise patentable over Halkyard.

Claims 1-3, 10, 11, 18-20, 29, 32, 33-36, 43 and 44 stand rejected as anticipated by Finn (U.S. Patent No. 6,648,074). This rejection is likewise respectfully traversed.

In asserting Finn, the Examiner has pointed to Fig. 11. At the outset, it is to be noted that independent Claims 1, 34 as well as independent Claim 18 recite that the centralizer is in gripping relationship with the upset portion and that the centralizer and upset portion are prevented from any relative movement. As in the case of Halkyard, this limitation renders independent Claims 1, 18 and 34 clearly patentable over Finn et al. Fig. 11 of Finn et al does not show a system wherein there is a metallic centralizer in gripping relationship with an upset portion on a metallic pipe whereby the centralizer and the upset portion are prevented from any relative movement. As pointed out in column 3, lines 55-62, and in basically describing the apparatus of Finn shown in Figs. 9-11, there is a keel joint having an elongated guide, the guide having a vertical bore therethrough. A shaft is fitted within the bore of the guide, the shaft having a vertical bore therethrough for passage of one of the risers. A wear insert is associated with the shaft, the wear insert having an outer surface for slidingly engaging a portion of the keel joint. As particularly noted in column 10, lines 44 *et seq.* the ball wear insert 94 is attached to the outer circumferential surface of flanges 92 and has an outer surface for slidingly engaging a portion of the keel joint 22. As further noted in the cited lines, the convex outer shape of

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the ball permits a small degree of rotation of shaft 86 within guide 82. In any event, ball insert 94 clearly permits movement of some degree between sleeve 108 which the Examiner has equated to the centralizer and the metallic upset 92. Indeed, if this were not the case there would be no reason for ball wear insert 94, the avowed use of which is to permit a degree of rotation of shaft 86 within the guide 82. There is no question from the teachings of Finn et al, but that the purpose of the ball wear insert 94 is to permit relative movement between ball insert 94 and sleeve 108. See column 10, lines 23 *et seq* where it is pointed out that the keel joint segregates the function of rotation of the risers within the keel in response to bending movements on the risers and wear in response to relative motion between the risers and the hull, and that this configuration allows the use of specific materials to minimize wear and galling. Ball wear insert 94 in combination with flanges 92 is nothing more than, as described by Finn et al in line 30, a "ball joint" and as the Examiner well knows, a ball joint is specifically designed to allow relative movement between the ball and the parts to which it is affixed. It is respectfully submitted that independent Claims 1, 18 and 34 are, in no way, anticipated by Finn.

As to Claims 2-3, 10, 11, 20, 29, 32, 33, 35, 36, 43 and 44, since those claims are all dependent upon at least one of independent Claims 1, 18 or 34 and further limit those independent claims, it is respectfully submitted that those claims are likewise patentable over Finn.

Claims 4-8, 15-17, 30, 37 and 38-41 stand rejected as obvious over Finn in view of Morris (U.S. Patent No. 3,560,060). This rejection is respectfully traversed and in this regard Applicant's remarks submitted with the prior response are incorporated herein by reference for all purposes. For reasons stated in the prior response, Applicant

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respectfully submits that Claims 4-8, 15-17, 30, 37 and 38-41 are patentable over Finn in view of Morris.

Claim 9 stands rejected as being obvious in view of Halkyard. Again, this rejection has been specifically addressed in Applicant's prior response and the remarks in the prior response regarding this rejection are incorporated herein by reference for all purposes.

Claims 12 and 14 stand rejected as being unpatentable over Finn in view of Angman (U.S. Patent No. 6,585,052). For purposes stated in Applicant's prior response with respect to this rejection, Applicant submits that the combination of Finn and Angman is unavailing to render Claim 14 obvious. Further, since Claim 14 depends upon Claim 12 and further limits it, it is also patentable over the combination of Finn and Angman.

Claim 13 stands rejected as obvious over Finn in view of Angman and further in view of Morris. For reasons stated in Applicant's prior response, which are incorporated herein by reference for all purposes, Applicant respectfully submits that Claim 13 is clearly patentable over the combination of Finn, Angman and Morris.

Claims 21-28 stand rejected as obvious over Finn. As noted in the prior response, Claims 21-28 are all dependent upon Claim 18 which, as noted above, is clearly patentable over Finn. Accordingly, Claims 21-28 are likewise patentable over Finn.

Claims 21-28 stand rejected as unpatentable over Finn. For reasons stated in Applicant's prior response, incorporated herein by reference for all purposes, it is respectfully submitted that Claims 21-28 are clearly patentable over Finn et al.

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Claims 31 and 42 stand rejected as unpatentable over Finn in view of Halkyard. For reasons stated in Applicant's prior response, incorporated herein by reference for all purposes, Claims 31 and 42 are clearly patentable over Finn in view Halkyard.

It is respectfully submitted that in applying the Halkyard and Finn references, the primary references, the Examiner is simply ignoring the fact that Applicant's claims call for the centralizer and the upset portion to be prevented from any relative movement. There is absolutely no way that either of those references can be construed to meet that limitation without departing from the express teachings of the references.

In view of the foregoing remarks, it is respectfully submitted that all claims are in condition for allowance which is hereby earnestly solicited and respectfully requested. In the event Applicant's response does not place this application in condition for allowance, the Examiner is respectfully requested to enter the response for purposes of appeal.

Respectfully submitted,



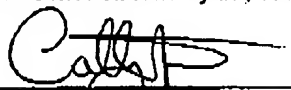
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CERTIFICATE OF FACSIMILE

I certify that this document is being facsimile transmitted to Facsimile No. 571-273-8300, U.S. Patent Office on January 29, 2007.


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